

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA	)	
	)	
v.	)	Docket No. 20-cr-40036-TSH
	)	
	)	
VINCENT KIEJZO	)	
	)	

**ASSENTED-TO MOTION TO ENLARGE TIME  
FOR FILING OF MOTIONS AND CONTINUE INITIAL PRETRIAL CONFERENCE**

Now comes the defendant, Vincent Kiejzo, and requests that this Honorable Court enlarge the time for filing motions by approximately 45 days from the presently scheduled filing date of September 15, 2021. He also requests that the initial pretrial conference scheduled for September 23, 2021 be continued to a date after the newly scheduled date for filing of motions.

As grounds, the defendant states that resolution of the defendant's outstanding discovery requests, and a motion to compel, are still pending. The defendant's motion to compel is currently scheduled for a hearing on September 17, 2021.<sup>1</sup> Counsel will be able to prepare and file substantive motions only after the resolution of the defendant's motion to compel, and after her review of any production of the requested discovery. Counsel's request for a 45-day date for filing and the scheduling of an initial pretrial conference is also based on counsel's outstanding deadlines and briefings due in other matters, including several for an upcoming trial in the Boston Division of the United States District Court.

The defendant agrees to exclude from the calculation of the time within which the defendant must be brought to trial under the Speedy Trial Act, 18 U.S.C. §3161, et seq., the period

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<sup>1</sup> The matter was originally scheduled for a hearing on August 11, 2021, but was ultimately continued to September 7, 2021. On that date, undersigned counsel was ill, and the Court ultimately rescheduled the motion hearing for September 17, 2021.

between the initial pretrial conference on September 23, 2021 and the newly scheduled pretrial conference. As grounds therefor, the defendant states that ends of justice served by continuing the matter in order to afford the parties sufficient time to fully litigate outstanding discovery issues, and to permit the defendant to file any additional discovery and/or substantive motions. The parties therefore request that the Court exclude said period under the Speedy Trial Act.

Undersigned counsel has conferred with Assistant U.S. Attorney Kristen Noto and understands that the government assents to this motion.

Respectfully submitted,  
VINCENT KIEJZO

By his Attorney,

/s/ Sandra Gant  
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CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on September 10, 2021.

/s/ Sandra Gant  
Sandra Gant